IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

DEC 29 2016

Alexandria Division

UNITED STATES OF AMERICA	)	Case No. 1:16MJ590
	)	
v.	)	**UNDER SEAL**
	)	
JEFFREY ALLEN YOTHERS, JR.,	)	
	)	
Defendant.	)	

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT

Your Affiant, Conor Washington, having been duly sworn, does hereby depose and state:

1.   I make this affidavit in support of a criminal complaint and an application for an arrest warrant under Rule 4 on the Federal Rules of Criminal Procedure.

2.   I am a Special Agent with the Social Security Administration, Office of the Inspector General (SSA-OIG), Office of Investigations, assigned to the Washington, DC Office. I have been a Special Agent since February 2009. As part of my duties, I investigate allegations of fraud, waste, and abuse in violation of the Social Security Act and conduct criminal investigations relating to the programs and operations of the SSA. I have received training in general law enforcement and in criminal investigations involving violations of the Social Security Act. I have received training from the Federal Law Enforcement Training Center in Glynco, Georgia, and I have investigated or assisted in the investigation of a number of cases involving fraudulent activity, including social security fraud, bank fraud, and identity theft, and have received specialized training in these fields.

3.   As a result of my personal participation in the investigation detailed below and

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through information obtained from Department of State, Diplomatic Security Service (DSS) agents involved in this investigation, I am familiar with all aspects of this investigation. The information provided is based on my personal observations, my training and experience, and information conveyed to me by other law enforcement officials, officials of the SSA and my review of records, documents and other physical evidence obtained during the investigation. This affidavit is intended to show merely that there is probable cause for the criminal complaint and requested warrant and does not set forth all of my knowledge about this matter.

4. Based on the facts set forth in this affidavit, there is probable cause to believe that JEFFREY ALLEN YOTHERS, JR. ("YOTHERS") has committed Social Security Number Fraud, in violation of Title 42, United States Code, Section 408(a)(7)(B).

BACKGROUND

5. Wells Fargo Bank is insured by the Federal Deposit Insurance Corporation (FDIC) and was too at the time of the offense described herein.

PROBABLE CAUSE

6. My review of new account records provided by Wells Fargo Bank revealed that on or about March 11, 2015, YOTHERS opened a checking account ending in 2709 at the Wells Fargo Bank branch located at 330 North Washington Street, Alexandria, Virginia, which is located within the Eastern District of Virginia. To open the account, YOTHERS provided the bank with SSN XXX-XX-9625. YOTHERS provided his United States Passport (XXX-XXX-759) to Wells Fargo as proof of his identity.

7. On or about March 25, 2015, YOTHERS electronically deposited Wells Fargo check number 1977266 for $3,081.73, issued on March 19, 2015 by Clinkbank.com, into Wells

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Fargo account ending in 2709. On March 26, 2015, Wells Fargo check number 1977266 was returned as being altered/fictitious.

8.   On or about March 26, 2015, YOTHERS electronically deposited Wells Fargo check number 2987192 for $3,081.73, issued on March 23, 2015 by Clinkbank.com, into Wells Fargo account number ending 2709. On March 27, 2015, Wells Fargo check number 2987192 was returned as being altered/fictitious.

9.   Between March 25, 2015 and March 27, 2015, YOTHERS withdrew $1,286.95 from Wells Fargo account ending in 2709. Following the return of the two altered/fictitious checks, YOTHERS' account was overdrawn by $1,020.27. YOTHERS ceased all activity with this account on March 30, 2016, and on May 27, 2015, Wells Fargo charged off an actual loss of $2,394.65 and closed the account ending in 2709.

10.   On or about January 6, 2016, the SSA-OIG received an allegation that Yothers had utilized a Social Security Number (SSN) which was not assigned to him to open bank accounts.

11.   Your affiant queried the SSA database and determined that the SSN YOTHERS used to open Wells Fargo account ending in 2709, SSN XXX-XX-9625, is assigned to K.W. A review of K.W.'s SSA record revealed that one SSN card had been issued under K.W.'s record. The SSN card was issued on or around April 11, 2000. According to SSA records, K.W. would have been approximately one month old at the time the SSN card was issued.
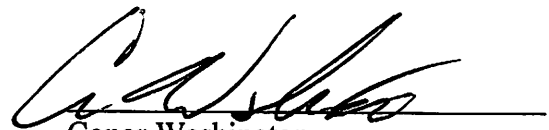
12.   Your affiant further reviewed the SSA database and determined SSN XXX-XX-8056 is assigned to YOTHERS.

13.   Additional investigation has revealed that in March 2015, YOTHERS opened at

least five bank accounts at Wells Fargo and TD Bank branches in Alexandria, Virginia, located in the Eastern District of Virginia, and Washington, DC using three different social security numbers that were not assigned to him. My investigation has revealed at least five instances of a scheme to obtain approximately $30,000 from financial institutions in which YOTHERS deposited fraudulent checks into these new bank accounts, and then withdrew funds as cash or through point-of-sale transactions until the banks recognized the checks as fraudulent and rejected the deposit amount.

CONCLUSION

14.   Based on my training and experience, and the information provided in this affidavit, your affiant respectfully submits that there is probable cause to believe that on or about March 11, 2015, in Alexandria, Virginia, located within the Eastern District of Virginia, YOTHERS falsely represented a social security number to be his with the intent to deceive, in violation of 42 U.S.C. § 408(a)(7)(B). Accordingly, I request that this Court issue a warrant to arrest YOTHERS for such offenses.

Conor Washington
Special Agent
Social Security Administration
Office of the Inspector General

Sworn to and subscribed before me this
21ˢᵗ day of December 2016 at Alexandria, Virginia

The Honorable Theresa C. Buchanan
United States Magistrate Judge

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